

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

EXXON MOBIL CORPORATION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
ROBERT ANDRES BONTA A.K.A.	§	
ROB BONTA, IN HIS INDIVIDUAL	§	Case No. 1:25-cv-00011-MJT
CAPACITY; SIERRA CLUB, INC.;	§	
SURFRIDER FOUNDATION, INC.;	§	
HEAL THE BAY, INC.; BAYKEEPER,	§	
INC.; AND INTERGENERATIONAL	§	
ENVIRONMENT JUSTICE FUND LTD.	§	
	§	
Defendants.	§	
	§	

DECLARATION OF ALLISON CHIN

I, Allison Chin, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am over the age of 18 and have personal knowledge of the facts stated in this declaration.
2. I am a resident of Los Angeles, California and have been since 2020.
3. I have been a member of Sierra Club since approximately 1982.
4. I currently am Sierra Club president and chair of its Board of Directors.
5. The role of Sierra Club president and chair of its Board of Directors is a volunteer position. My current term as Sierra Club president and chair of its Board of Directors expires in June 2025.

6. I am not an employee of Sierra Club. I have never been an employee of Sierra Club.

7. Typically I perform my duties as Sierra Club president and chair of its Board of Directors from my home in Los Angeles, California.

8. On September 23, 2024, I spoke at a virtual press conference hosted on Zoom (the “Virtual Press Conference”) regarding Sierra Club’s September 23, 2024 lawsuit against ExxonMobil filed in the Superior Court of California, County of San Francisco.

9. I did not invite anyone to attend the Virtual Press Conference.

10. My statements at the Virtual Press Conference were not directed at Texas or its residents. Texas was not “the” or even “a” focal point of my statements at the Virtual Press Conference.

11. ExxonMobil’s Complaint (Paragraph 91) attributes to me the following statements: “our environment and health were being sacrificed just to protect ExxonMobil’s bottom line,” and “ExxonMobil’s ‘days of polluting with impunity are over.’” These are not accurate quotations of my actual words at the Virtual Press Conference.

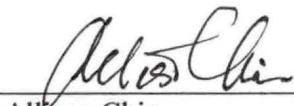
12. I did not receive a request for correction, clarification or retraction from ExxonMobil about my statements at the Virtual Press Conference.

13. I am not aware of anyone at Sierra Club receiving a request for correction, clarification or retraction from ExxonMobil about my statements at the Virtual Press Conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 21, 2025

By:



Allison Chin